

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**THE DRA PARTIES' MOTION IN COMPLIANCE WITH
ORDER DIRECTING UNSEALING OF (I) REPLY TO THE OBJECTION OF
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO TO
DRA PARTIES' MOTION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE
CLAIM AND (II) ATTACHMENT TO THE DRA PARTIES' RESPONSE TO
EVIDENTIARY OBJECTION TO THE EXPERT REPORT ATTACHED TO THE DRA
PARTIES' REPLY IN SUPPORT OF THE DRA PARTIES' MOTION FOR
ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM**

To The Honorable United States District Judge Laura Taylor Swain:

COME NOW AmeriNational Community Services, LLC (the “Servicer”), as servicer for the GDB Debt Recovery Authority (the “DRA”), and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “Collateral Monitor,” and together with the Servicer, collectively, the “DRA Parties”), which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds that the DRA issued pursuant to the *Government*

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801).

Development Bank for Puerto Rico Debt Restructuring Act, Act No. 109-2017, as amended by Act No. 147-2018, and the approved Qualifying Modification for the Government Development Bank for Puerto Rico (the “GDB”)² under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (“PROMESA”), by and through the undersigned legal counsel, and respectfully submit this motion (the “Motion”) in compliance with the Court’s October 21, 2021 *Order Directing Unsealing of (I) Reply to the Objection of Financial Oversight and Management Board for Puerto Rico to DRA Parties’ Motion for Allowance of Administrative Expense Claim and (II) Attachment to the DRA parties’ Response to Evidentiary Objection to the Expert Report Attached to the DRA Parties’ Reply in Support of The DRA Parties’ Motion for Allowance of Administrative Expense Claim* [ECF No. 18626] (the “Unsealing Order”).

1. The Unsealing Order directs the DRA Parties to file by October 28, 2021 at 5:00 P.M. (Atlantic Standard Time) either (i) “a certification that the Unredacted Reply^[3] and/or the Unredacted Expert Report do not require any additional redactions to comply with Rule 9037(a), or (ii) refile the Unredacted Reply and/or the Unredacted Expert Report with only the redactions required by Federal Rule of Bankruptcy Procedure 9037(a).” *Id.* at p. 2.

2. In compliance with the Unsealing Order, the DRA Parties are hereby filing an Unredacted Reply as **Exhibit A** to this Motion and an Unredacted Expert Report as **Exhibit B** to this Motion with only the necessary redactions under Fed. R. Bankr. P. 9037(a).

² See ECF No. 270 of Civil Case No. 18- 01561 (LTS) (Nov. 7, 2018).

³ Capitalized terms not otherwise defined in this Motion shall have the meaning ascribed to them in the Unsealing Order.

WHEREFORE, the DRA Parties request that the Court deem the DRA Parties in compliance with the Unsealing Order and accept the filing of the Unredacted Reply and Unredacted Expert Report as **Exhibits A** and **B** to this Motion, respectively.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th day of October, 2021.

WE HEREBY CERTIFY that, in accordance with the Court's *Fifteenth Amended Notice, Case Management and Administrative Procedures Order* (the "CMP Order") [Dkt. No. 17127-1] on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case. We further certify that, on this same date, we served the foregoing upon all the Standard Parties as identified and defined in the CMP Order.

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